

## Wainberg, Daniel

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**From:** Battaglia, Frank  
**Sent:** Tuesday, April 04, 2017 12:12 PM  
**To:** Wainberg, Daniel  
**Subject:** FW: Cranston RCRA project

CIBA issue for today's meeting.

**From:** Joseph F Guarnaccia [<mailto:joseph.guarnaccia@basf.com>]  
**Sent:** Tuesday, March 14, 2017 1:28 PM  
**To:** Battaglia, Frank <[battaglia.frank@epa.gov](mailto:battaglia.frank@epa.gov)>  
**Cc:** Steve Graham ([sgraham@aeiconsultants.com](mailto:sgraham@aeiconsultants.com)) <[sgraham@aeiconsultants.com](mailto:sgraham@aeiconsultants.com)>; Rick Kowalski <[rkowalski@aeiconsultants.com](mailto:rkowalski@aeiconsultants.com)>  
**Subject:** Cranston RCRA project

Frank

BASF has begun the RAWP for the PCB soil project, and there have emerged several issues which we would like to discuss with you before we dive into the design in earnest. They include:

1. 2015 Revised FEMA floodplain map which now covers most of the capped area.
2. Subsurface infrastructure that will encumber soil removal. What are EPA's expectations regarding non-soil subsurface structures? The reality is that removing all soil >10ppm will be difficult at best, and likely not 100% feasible.
3. There will be an ELUR on the property requiring non-residential, open-space reuse in perpetuity. Options include: no public access open space (enhanced habitat); public access open space (park), public access dog park. At a minimum, BASF wants to avoid signage indicating the presence of PCBs. There will be a cap w/ or w/o a fence. Long-term O&M will be required as per the ELUR. A review of RIDEM and TSCA regulation indicates that a low-occupancy cap is sufficient to support this constrained set of uses.
4. The main comment from the public was regarding the volume of truck traffic, and can it be reduced.
5. The design needs to consider the expanded floodplain, trucking concerns, subsurface structural impediments and land-use constraints relative to EPA expectations. Considering the project on a technical basis, all BASF and stakeholder objectives, including protectiveness, can be achieved with a low-occupancy cap.

We would like to meet w/ you at your office at your earliest convenience, and preferably before the CD is consummated, to discuss project details and EPA expectations. The purpose is to properly scope a pre-design investigation and develop the design that meets both our expectations.

I know you told me you have personal commitments over the next weeks, but if you can find time in the next 2 weeks to meet with us, it would be greatly appreciated. An in-person meeting is best, but a conference call is a possibility as well.

Please let me know.  
Regards

**Joe**  
EHS Remediation Specialist

Phone: 973 245 5269 Mobile: 732 762 4743 E-Mail: [joseph.guarnaccia@basf.com](mailto:joseph.guarnaccia@basf.com)  
Postal Address: BASF Corporation, 100 Park Ave, Florham Park, N.J. 07932 USA



SEMS DocID 645568

## Battaglia, Frank

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**Cc:** Steve Graham (sgraham@aeiconsultants.com); Rick Kowalski  
**Subject:** Cranston RCRA project

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

SEE 761.61c PCB  
REMAIN IN PLACE  
IF CAN'T ACCESS - SEE ITEM 2

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